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PATENT APPLICATION

ATTORNEY DOCKET NO. 10011005-1

IN THE
UNITED STATES PATENT AND TRADEMARK OFFICE

Inventor(s): James Clough, et al.

Confirmation No.: 1219

Application No.: 09/929,424

Examiner: Pwu, Jeffrey C.

Filing Date: August 13, 2001

Group Art Unit: 2143

Title: **METHODS, SYSTEMS, DEVICES AND COMPUTER-READABLE MEDIA FOR ACCESSING NETWORK ACCESSIBLE DEVICES (as amended)**

Mail Stop Appeal Brief-Patents
Commissioner For Patents
PO Box 1450
Alexandria, VA 22313-1450

TRANSMITTAL OF APPEAL BRIEF

Transmitted herewith is the Appeal Brief in this application with respect to the Notice of Appeal filed on August 16, 2006.

The fee for filing this Appeal Brief is (37 CFR 1.17(c)) \$500.00.

(complete (a) or (b) as applicable)

The proceedings herein are for a patent application and the provisions of 37 CFR 1.136(a) apply.

☐ (a) Applicant petitions for an extension of time under 37 CFR 1.136 (fees: 37 CFR 1.17(a)-(d)) for the total number of months checked below:

☐ 1st Month
\$120

☐ 2nd Month
\$450

☐ 3rd Month
\$1020

☐ 4th Month
\$1590

☐ The extension fee has already been filed in this application.

☒ (b) Applicant believes that no extension of time is required. However, this conditional petition is being made to provide for the possibility that applicant has inadvertently overlooked the need for a petition and fee for extension of time.

Please charge to Deposit Account 08-2025 the sum of \$ 500 . At any time during the pendency of this application, please charge any fees required or credit any over payment to Deposit Account 08-2025 pursuant to 37 CFR 1.25. Additionally please charge any fees to Deposit Account 08-2025 under 37 CFR 1.16 through 1.21 inclusive, and any other sections in Title 37 of the Code of Federal Regulations that may regulate fees. A duplicate copy of this sheet is enclosed.

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Respectfully submitted,

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Appl. No. 09/929,424

Atty. Docket No. 10011005-1



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of :
James Clough, et al. : Confirmation No.: 1219
Appl. No. 09/929,424 : Group Art Unit: 2143
Filed: August 13, 2001 : Examiner: Pwu, Jeffrey C.
For METHODS AND SYSTEMS FOR
ACCESSING NETWORK-ACCESSIBLE DEVICES

APPEAL BRIEF

Mail Stop Appeal Brief – Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

S I R:

This is an appeal from the final rejection of claims 1-36 of the
above-identified application.

I. REAL PARTY IN INTEREST

The real party in interest is Hewlett-Packard Development
Company, LP, a limited partnership established under the laws of the State of
Texas and having a principal place of business at 20555 S.H. 249 Houston, TX
77070, U.S.A. (hereinafter "HPDC"). HPDC is a Texas limited partnership and is
a wholly-owned affiliate of Hewlett-Packard Company, a Delaware Corporation,

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Appl. No. 09/929,424

Atty. Docket No. 10011005-1

headquartered in Palo Alto, CA. The general or managing partner of HPDC is HPQ Holdings, LLC.

II. RELATED APPEALS AND INTERFERENCES

No prior or pending appeals, interferences or judicial proceedings relating to, directly affecting or directly affected by this appeal, or having a bearing on the Board's decision in this appeal, are known to appellant, the appellant's legal representative, or assignee.

III. STATUS OF THE CLAIMS

Claims 1-36 are pending in the application and stand rejected by the Examiner as stated in the Office Action made Final and dated June 16, 2006. No claim stands withdrawn, cancelled or allowed. The claims on appeal are claims 1-36 as they appear in the attached Claims Appendix.

IV. STATUS OF AMENDMENTS

No amendments have been filed in this application subsequent to final rejection made in the Office Action of June 16, 2006.

V. SUMMARY OF CLAIMED SUBJECT MATTER

Appellant's claimed invention relates in general to accessing network-accessible devices. In various embodiments, individual network-accessible devices are configured to wirelessly transmit or beacon data that can be used to access the device, such as network address data. Wirelessly-enabled client devices can receive the transmitted address data. Thus, the client devices, even if they were previously unaware of the network-accessible devices, can become knowledgeable of these devices. The address data permits the wirelessly-enabled client devices to access and use the network-accessible

devices. Access to the network-accessible devices can take place via any suitable mechanism such as via a wireless network and/or Internet connection.

The subject matter of independent claim 1 is directed to a system for accessing network-accessible devices that includes multiple network-accessible devices (reference numeral 400 in Figures 4 and 5). Each network-accessible device 400 comprises a wireless transmitter 410. The wireless transmitter 410 wirelessly transmits associated address data for receipt by individual client devices 300 (see page 3, lines 22-26 and page 6, lines 24-26). The address data is configured for use in accessing, via a network, a network-accessible device 400 that wirelessly transmitted the associated address data (see page 3, line 26 through page 4, line 3). The system of claim 1 also includes a connection module 412 for establishing a network link 504, 506 with one or more client devices 300 based upon the wirelessly transmitted address data (see page 7, lines 3-6). The link 504, 506 permits individual client devices 300 to access a network-accessible device 400 using the associated address data.

The subject matter of independent claim 6 is directed to a system for accessing Internet-connected printers that includes one or more Internet-connected printers 400 (see page 11, lines 23-26 stating that network-accessible devices can take many forms, including printers). Individual printers 400 comprise a wireless transmitter 410. The wireless transmitter 410 wirelessly transmits associated address data for receipt by individual client devices 300 (see page 3, lines 22-26 and page 6, lines 24-26). The address data is configured for use in accessing, via the Internet, an Internet-connected printer 400 that wirelessly transmitted the associated address data (see page 3, line 26 through page 4, line 3). The system of claim 1 also includes an Internet connection module 412 for establishing an Internet link 504, 506 with one or more client devices 300 based upon the wirelessly transmitted address data (see page 7, lines 3-6). The Internet link 504, 506 permits individual client devices

300 to access an Internet-connected printer 400 using the associated address data.

The subject matter of independent claim 8 is directed to a network-accessible device 400 comprising one or more processors 402 and one or more computer-readable media 404 (see page 6, lines 7-12). Also included is a wireless transmitter 410 for wirelessly transmitting address data associated with the device 400 (see page 3, lines 22-24 and page 6, lines 24-26). The address data is used to establish an Internet connection 504, 506 with the device 400 (see page 8, lines 3-9). An Internet connection module 412 is provided for establishing an Internet connection 504, 506. The device of claim 8 includes instructions on the computer-readable media 404 which, when executed by the one or more processors 402, cause the processors 402 to: 1) transmit address data for the device 400 using the wireless transmitter 410 (see page 3, lines 22-26 and page 6, lines 24-26), 2) establish an Internet connection 504, 506 using the connection module 412, the Internet connection 504, 506 being establishable with one or more client devices 300 that receive the wirelessly transmitted address data, and being based on the wirelessly transmitted address data (see page 3, line 26 through page 4, line 3), and 3) permit interaction with the device 400 via the Internet connection 504, 506 (see page 8, lines 10-12).

The subject matter of independent claim 13 is directed to an Internet-connected printer 400 comprising one or more processors 402 and one or more computer-readable media 404 (see page 6, lines 7-12). Also included is a wireless transmitter 410 for wirelessly transmitting address data associated with the printer 400 (see page 3, lines 22-24 and page 6, lines 24-26). The address data is used to establish an Internet connection 504, 506 with the printer 400 (see page 8, lines 3-9). An Internet connection module 412 is provided for establishing an Internet connection 504, 506. The printer of claim 13 includes instructions on the computer-readable media 404 which, when executed by the

one or more processors 402, cause the processors 402 to: 1) transmit address data for the printer 400 using the wireless transmitter 410 (see page 3, lines 22-26 and page 6, lines 24-26), 2) establish an Internet connection 504, 506 using the Internet connection module 412, the Internet connection 504, 506 being establishable with one or more client devices 300 that receive the wirelessly transmitted address data, and being based on the wirelessly transmitted address data (see page 3, line 26 through page 4, line 3), and 3) permit interaction with the printer 400 via the Internet connection 504, 506 (see page 8, lines 10-12).

The subject matter of independent claim 14 is directed to a client device 300 (Figures 3 and 5) comprising one or more processors 302 and one or more computer readable media 304 (see page 4, lines 17-22). Also included is a wireless receiver 310 for receiving wirelessly transmitted address data associated with one or more Internet-accessible devices 400 (see page 5, lines 5-6 and page 7, lines 17-20). A connection module 314 is provided for establishing an Internet connection 504, 506. The client device of claim 14 includes instructions on the computer-readable media 304 which, when executed by the one or more processors 302, cause the processors 302 to: 1) establish an Internet connection 504, 506 using the connection module 314 (see page 8, lines 3-9), 2) process address data wirelessly received by the wireless receiver 310 from at least one Internet-accessible device 400 (see page 10, lines 20-22), and 3) establish an Internet link 504, 506 with one or more Internet-accessible devices 400 using the address data (see page 8, lines 3-9 and page 10, lines 20-22).

The subject matter of independent claim 21 is directed to a method for accessing network-accessible devices 400 comprising wirelessly beaconing address data associated with a particular device 400 (see page 7, lines 17-20). The address data is configured for receipt by one or more client devices 300 so that the one or more client devices 300 can use the address data to establish an

Internet link 504, 506 with the particular device 400 for interacting with the particular device 400 (see page 3, line 26 through page 4, line 3). The method of claim 21 further includes establishing an Internet link 504, 506 with one or more client devices 300 based on the wirelessly beacons address data (see page 8, lines 3-9). The link 504, 506 permits interaction between the particular device 400 and the one or more client devices 300 (see page 8, lines 10-12).

The subject matter of independent claim 28 is directed to one or more computer-readable media 404 having computer-readable instructions thereon which, when executed by one or more processors 402 on a network-accessible device 400, cause the processors 402 to wirelessly beacon address data associated with the network-accessible device (see page 6, lines 7-12 and page 7, lines 17-20). The address data is configured for receipt by one or more client devices 300 so that the one or more client devices 300 can use the address data to establish an Internet link 504, 506 with the network-accessible device 400 for interacting with the network-accessible device 400 (see page 3, line 26 through page 4, line 3). The instructions also cause the processors 402 to establish an Internet link 504, 506 with one or more client devices 300 based on the wirelessly beacons address data (see page 8, lines 3-9). The link 504, 506 permits interaction with the one or more client devices 300 (see page 8, lines 10-12).

The subject matter of independent claim 29 is directed to a method for accessing Internet-accessible devices 400 comprising discovering one or more Internet-accessible devices 400 by wirelessly receiving one or more URLs associated with and transmitted by the Internet-accessible devices 400 (see page 7, lines 23-24 and page 8, lines 13-20). The method of claim 29 further includes establishing an Internet connection 504, 506 with the one or more Internet-accessible devices 400 based on the one or more URLs (see page 8, lines 3-9), and interacting with the one or more Internet-accessible devices 400

via the Internet connection 504, 506 (see page 11, line 19 through page 12, line 4).

The subject matter of independent claim 32 is directed to a method of accessing an Internet-connected printer 400 comprising wirelessly receiving, with a client device 300, address data associated with one or more Internet-connected printers 400 (see page 5, lines 5-6 and page 7, lines 17-20). The method of claim 32 further includes processing the address data with the client device 300 to establish an Internet link 504, 506 with one or more Internet-connected printers 400 (see page 10, lines 20-22), and interacting with the Internet-connected printers 400 via the Internet link 504, 506 (see page 11, line 19 through page 12, line 4).

The subject matter of independent claim 36 is directed to one or more computer-readable media 304 having computer-readable instructions thereon which, when executed by one or more processors 302 on a client device 300, cause the processors 302 to wirelessly receive, with the client device 300, address data associated with one or more Internet-connected printers 400 (see page 7, lines 17-20) and process the address data with the client device 300 to establish an Internet link 504, 506 with one or more Internet-connected printers 400 (see page 10, lines 20-22). The instructions also cause the processors 302 to interact with the Internet-connected printers 400 via the Internet link 504, 506 (see page 8, lines 10-12).

VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

It is respectfully requested that the Board of Patent Appeals and Interferences rule on the issue of: Whether claims 1-36 are unpatentable under 35 U.S.C. 102(e) over U.S. Patent Application Publication No. 2002/00665873 published May 30, 2002 in the name of Ishizuka (hereinafter referred to as "Ishizuka").

VII. ARGUMENT

Rejection under 35 U.S.C. 102(e) over Ishizuka

The Examiner has cited the Ishizuka reference as anticipating claims 1-36 under 35 U.S.C. 102(e). Section 102(e) of the Patent Act states, in pertinent part, "a person shall be entitled to a patent unless ... the invention was described in - (1) an application for patent, published under section 122(b), by another filed in the United States before the invention by the applicant for patent...." 35 U.S.C. § 102(e). To anticipate a claim, a reference must teach each and every element as set forth in the claim. *Verdegaal Bros. V. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). *See also, Advanced Display Systems, Inc. v. Kent State University*, 54 USPQ2d 1673, 1679 (Fed. Cir. 2000) ("anticipation requires that the four corners of a single, prior art document describe every element of the claimed invention, either expressly or inherently, such that a person of ordinary skill in the art could practice the invention without undue experimentation"). Furthermore, whether a reference is anticipatory is a question of fact. *In re Graves*, 36 USPQ2d 1697, 1700 (Fed. Cir. 1995).

Ishizuka discloses a method and system for printing from a wireless mobile device. Figure 1 shows an embodiment of one such system that uses the Internet 102 as a wide area network (WAN). The system includes a server 104 and a wireless mobile device 106 such as a wireless smart phone, a wireless personal digital assistant (PDA), or the like. The wireless mobile device 106 is configured to access the Internet 102 via an Internet service provider (ISP) 108. An addressable printer 110 is provided to receive print jobs from the wireless mobile device 106. Figure 3 shows that the wireless mobile device 106 comprises a bus 303, a processor 305, a memory unit 307, a storage device 311, a display 313, and an interface 317. Also included is an input device 315 that includes a PRINT button 319 configured to initiate printing by a default networked

printer. The printer 110 is made up of a bus 403, a processor 405, a memory unit 407, and a communication interface 409, as shown in Figure 4. The communication interface 409 provides two-way communication to a local area network (LAN) 413. A print server (also denoted with reference numeral 413) is connected to the LAN 413.

Figure 5 shows a flowchart describing a method for printing over a computer network. The process begins when a user of the wireless mobile device 106 transmits information to be printed over a wireless connection. The information to be printed is received by a WAN (e.g., the Internet 102). The WAN forwards the information to be printed to the printer 110, which then prints the information. The printer's address data is either stored in the wireless mobile device 106 or entered into the wireless mobile device 106 by the user.

For the reasons discussed below, appellant submits that Ishizuka fails to disclose each and every element of claims 1-36.

Claims 1-5

Independent claim 1 recites a system for accessing network-accessible devices that includes multiple network-accessible devices. Each of the devices includes a wireless transmitter for wirelessly transmitting associated address data for receipt by individual client devices. The address data is configured for use in accessing, via a network, a network-accessible device that wirelessly transmitted the associated address data.

In rejecting claim 1, the Examiner contends that the wireless mobile device 106 of Ishizuka corresponds to the claimed wireless transmitter and the printer 110 of Ishizuka corresponds to a client device. Appellant respectfully submits that this position is erroneous. The wireless transmitter of claim 1 is recited as being an element of a "network-accessible device." There is no indication in Ishizuka that the wireless mobile device 106 is an element of a

network-accessible device. The wireless mobile device 106 of Ishizuka is described more as *accessing* a network, not being *accessed* through a network (see, for example, Paragraph 0024 of Ishizuka: "The wireless mobile device 106 is configured to access the Internet via the ISP 108"). In fact, Paragraph 0025 of Ishizuka refers to the wireless mobile device 106 as being a client device ("...server 104 communicates with the wireless mobile devices (client) 106 via the Internet 102"). In addition, the printer 110 clearly is not a client device.

Moreover, even if assuming for the sake of argument that the wireless mobile device 106 of Ishizuka is a wireless transmitter in a network-accessible device (which it is not), there is simply no suggestion that the wireless mobile device 106 transmits its associated address data for receipt by a client device. The primary information that the wireless mobile device 106 is described as transmitting is the information that a user desires to be printed. See, for example, the Abstract ("transmitting to a wide area network (WAN) information a user wishes to print using a wireless mobile device"), Paragraph 0044 ("when a user has identified information which she wishes to print, and the information is provided on the Internet 102 in an HTML or XML file, then the wireless mobile device 106 transmits the file to the print server 413"), and Paragraph 0046 ("In step 501, a user transmits information to be printed from a wireless mobile device over a wireless connection"). There is no mention of the wireless mobile device 106 transmitting its own, or any other, address data.

The Examiner has mistakenly equated Ishizuka's teaching of transmitting information to be printed with the claimed notion of transmitting address data. On pages 10 and 11 of the June 16, 2006 final Office Action, the Examiner provides numerous examples of passages from Ishizuka that allegedly show that the wireless mobile device 106 transmits its associated address data. But these passages mostly refer to the "information to be printed," and none of these passages specifically mentions address data. Appellant respectfully

submits that address data and information to be printed are two very distinct types of information that are not equivalent. Address data generally refers to any data that can be used by a client device to access a network-accessible device, such as a URL (see, for example, lines 4-7 on page 9 of the present application). In contrast, "information to be printed" is just that: information that the user of a wireless mobile device 106 wishes to have printed as hardcopy. Paragraph 0046 of Ishizuka states the "information to be printed is generated by browsing the Internet, shopping on the Internet, using email, or any other application software. For example, a user may shop online using the wireless mobile device 106 and print a shopping record or receipt of his shopping activity or the user may receive email on the wireless mobile device 106 and wish to print a hardcopy of the message." As such, Ishizuka simply fails to disclose using the wireless mobile device 106 to transmit address data. And even if the wireless mobile device 106 did wirelessly transmit address data (which it does not), Ishizuka would still fail to teach the claimed limitation of a network-accessible device having a wireless transmitter for wirelessly transmitting associated address data because the wireless mobile device 106 is not a network-accessible device.

Appellant respectfully submits that Ishizuka would anticipate the claimed invention *only* if the printer 110 was disclosed as wirelessly transmitting its address data in order to be received by a wireless mobile device. However, Ishizuka does not teach or suggest having the printer 110 wirelessly transmit any type of address data. In Paragraph 0042, Ishizuka mentions that the printer 110 includes a communication interface 409 that provides a two-way data communication coupling to a local area network (LAN) 413, and that the communication interface 409 can be implemented as a wireless link. However, Ishizuka does not disclose transmitting the printer's address data over the interface 409. Paragraphs 0048 and 0049 of Ishizuka describe two ways for the wireless mobile device 106 to obtain the printer's address data. In the case of

the printer being a default printer, the wireless mobile device 106 is configured to store the printer address and any client print support files, as described in Paragraph 0048. If the user elects to print to a printer other than a default printer, the user must determine if the address and print driver of the target printer are stored in the memory of the wireless mobile device 106, as described on Paragraph 0049. If they are stored in memory, the user selects the address of the target printer and printing then proceeds in normal fashion. If the address is not stored in the memory of the wireless mobile device 106, the user inputs the address of the target printer. Thus, the address data is either already stored in the wireless mobile device 106 or entered by the user. There is no disclosure of the printer 110 wirelessly transmitting its address data to the wireless mobile device 106.

For the above reasons, Ishizuka fails to disclose each and every element of claim 1 and all claims depending therefrom, and therefore does not anticipate claims 1-5. It is thus respectfully submitted that the rejection of claims 1-5 under 35 U.S.C. 102(e) is in error and should be reversed.

Claims 6 and 7

Independent claim 6 recites a system for accessing Internet-connected printers that includes one or more Internet-connected printers. Individual printers comprise a wireless transmitter for wirelessly transmitting associated address data for receipt by individual client devices. The address data is configured for use in accessing, via the Internet, an Internet-connected printer that wirelessly transmitted the associated address data.

In rejecting claim 6, the Examiner again contends that the wireless mobile device 106 of Ishizuka is a wireless transmitter. (It is noted that the rejection of claim 6 is different from the rejection of claim 1 in that the Examiner does not appear to contend that the printer 110 of Ishizuka corresponds to a

client device; there is no indication in this rejection of which element of Ishizuka corresponds to a client device.) However, the wireless transmitter of claim 6 is an element of an Internet-connected printer. The wireless mobile device 106 of Ishizuka, in contrast, is described as being "a wireless smart phone, a wireless personal digital assistant (PDA) or the like" (Paragraph 0023). It is not an element of an Internet-connected printer and is clearly distinct and separate from the only printer disclosed by Ishizuka, the printer 110. As discussed above, the wireless mobile device 106 does not wirelessly transmit its address data. Furthermore, the printer 110 does not wirelessly transmit its address data for the reasons discussed above. Ishizuka thus fails to disclose an Internet-connected printer having a wireless transmitter for wirelessly transmitting associated address data.

For these reasons, Ishizuka fails to disclose each and every element of claim 6, as well as claim 7 which depends therefrom, and therefore does not anticipate claims 6 and 7. It is thus respectfully submitted that the rejection of claims 6 and 7 under 35 U.S.C. 102(e) is in error and should be reversed.

Claims 8-13

Independent claim 8 recites a network-accessible device, and claim 13 recites an Internet-connected printer. Both claims recite, among other elements, one or more processors and a wireless transmitter for wirelessly transmitting associated address data. Both claims further recite computer-readable media having instructions that cause the processors to transmit the address data using the wireless transmitter and establish an Internet connection based on the wirelessly transmitted address data.

The rationale given in the June 16, 2006 final Office Action for rejecting claims 8 and 13 is only that these claims are "similarly rejected as in

claim 1." This presumably means that the Examiner is contending that the wireless mobile device 106 of Ishizuka corresponds to the claimed wireless transmitter for wirelessly transmitting associated address data. As discussed above, the wireless mobile device 106 is not an element of a network-accessible device or an Internet-connected printer, and the wireless mobile device 106 does not wirelessly transmit address data. Ishizuka does not disclose a network-accessible device or an Internet-connected printer that includes a wireless transmitter for wirelessly transmitting associated address data. The printer 110 of Ishizuka is arguably an Internet-connected printer, but for the reasons discussed above, the printer 110 does not wirelessly transmit address data.

Ishizuka also fails to disclose computer-readable media having instructions as recited in claims 8 and 13. As described in Paragraphs 0038, the wireless mobile device 106 of Ishizuka includes a processor 305 as well as a memory unit 307 and a storage device 311 that store instructions to be executed by the processor 305. However, there is no indication that the processor 305 causes the wireless mobile device 106 to wirelessly transmit its address data. As described in paragraphs 0040 and 0041, the printer 110 of Ishizuka includes a processor 405 and a memory unit 407 that stores instructions to be executed by the processor 405. However, there is no indication that the processor 405 causes the printer 110 to wirelessly transmit its address data or establish an Internet connection based on the transmitted address data.

Accordingly, Ishizuka fails to disclose each and every element of claims 8 and 13 and all claims depending therefrom, and therefore does not anticipate claims 8-13. It is thus respectfully submitted that the rejection of claims 8-13 under 35 U.S.C. 102(e) is in error and should be reversed.

Claims 14-20

Independent claim 14 recites a client device that includes, among other elements, one or more processors and a wireless receiver for receiving wirelessly transmitted address data associated with one or more Internet-accessible devices. The client device of claim 14 further includes computer-readable media having instructions that cause the processors to process address data wirelessly received by the wireless receiver and establish an Internet link with one or more Internet-accessible devices using the address data.

Appellant respectfully submits that Ishizuka does not teach or suggest a client device having a wireless receiver for receiving wirelessly transmitted address data. Certainly the printer 110 of Ishizuka does not meet this claim recitation. As mentioned above, the printer 110 of Ishizuka is simply not a client device. Moreover, the only information that the printer is described as receiving is the information that the user wishes to print. There is no indication of the printer 110 wirelessly receiving address data.

The wireless mobile device 106 of Ishizuka is arguably a client device, but as described above, there is no indication in Ishizuka that the wireless mobile device 106 receives address data wirelessly transmitted from one or more Internet-accessible devices. Instead, Paragraphs 0048 and 0049 of Ishizuka describe that the wireless mobile device 106 either has printer address previously stored in its memory or a user inputs printer address data. Address data is not wirelessly transmitted to the wireless mobile device 106.

Consequently, Ishizuka fails to disclose each and every element of claim 14 and all claims depending therefrom, and therefore does not anticipate claims 14-20. It is thus respectfully submitted that the rejection of claims 14-20 under 35 U.S.C. 102(e) is in error and should be reversed.

Claims 21-28

Independent claim 21 recites a method for accessing network-accessible devices that includes wirelessly beaconing address data associated with a particular device so that one or more client devices can use the address data to establish an Internet link with the particular device. Independent claim 28 recites one or more computer-readable media having computer-readable instructions thereon that cause processors to wirelessly beacon address data associated with a network-accessible device so that one or more client devices can use the address data to establish an Internet link with the network-accessible device.

For the reasons discussed above, Ishizuka does not disclose wirelessly beaconing address data associated with a network-accessible device. The only information disclosed in Ishizuka as being wirelessly transmitted is information a user wishes to print using a wireless mobile device. Ishizuka thus fails to disclose each and every element of claims 21 and 28 and all claims depending therefrom, and therefore does not anticipate claims 21-28. It is thus respectfully submitted that the rejection of claims 21-28 under 35 U.S.C. 102(e) is in error and should be reversed.

Claims 29-31

Independent claim 29 recites a method for accessing network-accessible devices that includes discovering one or more Internet-accessible devices by wirelessly receiving one or more URLs associated with and transmitted by the Internet-accessible devices.

First, Ishizuka does not disclose "discovering" Internet-accessible devices. As described in Paragraphs 0048 and 0049, Ishizuka only contemplates using printers that have address data stored in 106 memory or that are known to the user so that the user can input the address data. There is no

suggestion of discovering previously unknown printers. Second, as discussed above, Ishizuka does not disclose wirelessly receiving one or more URLs.

Consequently, Ishizuka fails to disclose each and every element of claim 29 and all claims depending therefrom, and therefore does not anticipate claims 29-31. It is thus respectfully submitted that the rejection of claims 29-31 under 35 U.S.C. 102(e) is in error and should be reversed.

Claims 32 and 34-36

Independent claim 32 recites a method of accessing an Internet-connected printer that includes wirelessly receiving, with a client device, address data associated with one or more Internet-connected printers. Independent claim 36 recites one or more computer-readable media having computer-readable instructions thereon that cause processors to wirelessly receive, with the client device, address data associated with one or more Internet-connected printers.

As discussed above in connection with claims 14-20, Ishizuka does not teach or suggest a client device having a wireless receiver for receiving wirelessly transmitted address data. Neither the wireless mobile device 106 nor the printer 110 of Ishizuka is disclosed as wirelessly receiving address data. Ishizuka therefore fails to disclose each and every element of claims 32 and 36 and all claims depending therefrom, and therefore does not anticipate claims 32-36. It is thus respectfully submitted that the rejection of claims 32-36 under 35 U.S.C. 102(e) is in error and should be reversed.

Claim 33

Claim 33 depends from independent claim 32 and adds the further limitation of bringing the client device into close proximity with an Internet-connected printer that is transmitting address data. Ishizuka does not teach or suggest bringing a client device into close proximity with an Internet-connected

Appl. No. 09/929,424

Atty. Docket No. 10011005-1

printer. In fact, Paragraph 0047 of Ishizuka states that "the wireless mobile device 106 and the printer 110 may be at least one mile apart, five miles apart, 100 miles apart or 100 or more miles apart." (Emphasis added.) Clearly, Ishizuka does not contemplate bringing the wireless mobile device 106 and the printer 110 into close proximity and suggests that they be at least one mile apart.

For this reason, Ishizuka fails to disclose each and every element of claim 33 and therefore does not anticipate claim 33. It is thus respectfully submitted that the rejection of claim 33 under 35 U.S.C. 102(e) is in error and should be reversed.

Conclusion

Appellant has shown the rejection under 35 U.S.C. 102(e) to be in error. Therefore, the Board of Patent Appeals and Interferences is respectfully requested to reverse the final rejection of claims 1-36 and to hold all the claims to be allowable.

Respectfully submitted,

9/7/06

Date

Patrick R. Scanlon

Patrick R. Scanlon
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207-791-3110

VIII. CLAIMS APPENDIX

Claim 1. A system for accessing network-accessible devices comprising:

multiple network-accessible devices, each device comprising:

a wireless transmitter for wirelessly transmitting associated address data for receipt by individual client devices, the address data being configured for use in accessing, via a network, a network-accessible device that wirelessly transmitted the associated address data; and

a connection module for establishing a network link with one or more client devices based upon the wirelessly transmitted address data, said link permitting individual client devices to access a network-accessible device using the associated address data.

Claim 2. The system of claim 1, wherein said link comprises a wireless link.

Claim 3. The system of claim 1, wherein said link comprises a wired link.

Claim 4. The system of claim 1, wherein said link comprises an Internet link.

Claim 5. The system of claim 1, wherein said link comprises a wireless Internet link.

Claim 6. A system for accessing Internet-connected printers comprising:

one or more Internet-connected printers, individual printers

comprising:

a wireless transmitter for wirelessly transmitting associated address data for receipt by individual client devices, the address data being configured for use in accessing, via the Internet, an Internet-connected printer that wirelessly transmitted the associated address data; and

an Internet connection module for establishing an Internet link with one or more client devices based upon the wirelessly transmitted address data, said Internet link permitting individual client devices to access an Internet-connected printer using the associated address data.

Claim 7. The system of claim 6, wherein the Internet connection module is configured to establish a wireless Internet link.

Claim 8. A network-accessible device comprising:

one or more processors;

one or more computer-readable media;

a wireless transmitter for wirelessly transmitting address data associated with the device, the address data being useable to establish an Internet connection with the device;

an Internet connection module for establishing an Internet connection; and

instructions on the computer-readable media which, when executed by the one or more processors, cause the processors to:

transmit address data for the device using the wireless transmitter;

establish an Internet connection using the connection module, the Internet connection being establishable with one or more client devices that receive the wirelessly transmitted address data, and being based on the wirelessly transmitted address data; and

permit interaction with the device via the Internet connection.

Claim 9. The network-accessible device of claim 8, wherein the Internet connection comprises a wireless connection.

Claim 10. The network-accessible device of claim 8, wherein the Internet connection comprises a wired connection.

Claim 11. The network-accessible device of claim 8, wherein the wireless transmitter comprises a bluetooth transmitter.

Claim 12. The network-accessible device of claim 8, wherein the address data comprises at least one URL.

Claim 13. An Internet-connected printer comprising:
one or more processors;

one or more computer-readable media;
a wireless transmitter for wirelessly transmitting address data associated with the printer, the address data being useable to establish an Internet connection with the printer;
an Internet connection module for establishing an Internet connection; and
instructions on the computer-readable media which, when executed by the one or more processors, cause the processors to:
transmit address data for the printer using the wireless transmitter;
establish an Internet connection using the Internet connection module, the Internet connection being establishable with one or more client devices that receive the wirelessly transmitted address data, and being based on the wirelessly transmitted address data; and
permit interaction with the printer via the Internet connection.

Claim 14. A client device comprising:

one or more processors;
one or more computer readable media;
a wireless receiver for receiving wirelessly transmitted address data associated with one or more Internet-accessible devices;
a connection module for establishing an Internet connection; and

instructions on the computer-readable media which, when executed by the one or more processors, cause the processors to:

establish an Internet connection using the connection module;

process address data wirelessly received by the wireless receiver from at least one Internet-accessible device; and

establish an Internet link with one or more Internet-accessible devices using the address data.

Claim 15. The client device of claim 14, wherein the Internet connection comprises a wireless connection.

Claim 16. The client device of claim 14, wherein the Internet connection comprises a wired connection.

Claim 17. The client device of claim 14, wherein the instructions cause the processors to establish a wireless Internet connection.

Claim 18. The client device of claim 14, wherein the instructions cause the processors to establish a wired Internet connection.

Claim 19. The client device of claim 14, wherein the wireless receiver comprises a bluetooth receiver.

Claim 20. The client device of claim 14, wherein the address data comprises a URL.

Claim 21. A method for accessing network-accessible devices comprising:

wirelessly beaconing address data associated with a particular device, the address data being configured for receipt by one or more client devices so that the one or more client devices can use the address data to establish an Internet link with the particular device for interacting with the particular device; and

establishing an Internet link with one or more client devices based on the wirelessly beacons address data, said link permitting interaction between the particular device and the one or more client devices.

Claim 22. The method of claim 21, wherein said beaconing is performed by the particular device.

Claim 23. The method of claim 21, wherein said beaconing comprises using infrared technology to beacon the address data.

Claim 24. The method of claim 21, wherein said beaconing comprises using RF technology to beacon the address data.

Claim 25. The method of claim 21, wherein said beaconing comprises using bluetooth technology to beacon the address data.

Claim 26. The method of claim 21, wherein said address data comprises a URL.

Appl. No. 09/929,424

Atty. Docket No. 10011005-1

Claim 27. The method of claim 21, wherein said establishing the Internet link comprises establishing a wireless Internet link.

Claim 28. One or more computer-readable media having computer-readable instructions thereon which, when executed by one or more processors on a network-accessible device, cause the processors to:

wirelessly beacon address data associated with the network-accessible device, the address data being configured for receipt by one or more client devices so that the one or more client devices can use the address data to establish an Internet link with the network-accessible device for interacting with the network-accessible device; and

establish an Internet link with one or more client devices based on the wirelessly beacons address data, said link permitting interaction with the one or more client devices.

Claim 29. A method for accessing Internet-accessible devices comprising:

discovering one or more Internet-accessible devices by wirelessly receiving one or more URLs associated with and transmitted by the Internet-accessible devices;

establishing an Internet connection with the one or more Internet-accessible devices based on the one or more URLs; and

interacting with the one or more Internet-accessible devices via the Internet connection.

Claim 30. The method of claim 29, wherein said establishing comprises establishing a wireless Internet connection.

Claim 31. The method of claim 29, wherein said establishing comprises establishing a wired Internet connection.

Claim 32. A method of accessing an Internet-connected printer comprising:

wirelessly receiving, with a client device, address data associated with one or more Internet-connected printers;

processing the address data with the client device to establish an Internet link with one or more Internet-connected printers; and

interacting with the Internet-connected printers via the Internet link.

Claim 33. The method of claim 32, wherein said wirelessly receiving comprises bringing the client device into close proximity with an Internet-connected printer that is transmitting address data.

Claim 34. The method of claim 32, wherein said processing comprises establishing a wireless Internet link using the address data.

Claim 35. The method of claim 32, wherein said processing comprises establishing a wired Internet link using the address data.

Appl. No. 09/929,424

Atty. Docket No. 10011005-1

Claim 36. One or more computer-readable media having computer-readable instructions thereon which, when executed by one or more processors on a client device, cause the processors to:

wirelessly receive, with the client device, address data associated with one or more Internet-connected printers;

process the address data with the client device to establish an Internet link with one or more Internet-connected printers; and

interact with the Internet-connected printers via the Internet link.

Appl. No. 09/929,424

Atty. Docket No. 10011005-1

IX. EVIDENCE APPENDIX

None.

Appl. No. 09/929,424

Atty. Docket No. 10011005-1

X. RELATED PROCEEDINGS APPENDIX

None.